

1500 FLEET CENTER
PROVIDENCE, RHODE ISLAND 02903
401 274-2000

TELEX: 952039 HATS PVD-UD
TELECOPIER: 401 277-9600

EDWARD M. WATSON
ROBERT F. PICKARD
BENTLEY TOBIN*
RICHARD F. STAPLES
ROBERT W. SHADD
RICHARD W. BILLINGS
JOACHIM A. WEISSFELD
JAMES A. JACKSON
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RICHARD H. PIERCE*
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CHARLES S. SOKOLOFF*
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GERARD B. SULLIVAN
MICHAEL A. MOSCO
DANIEL A. LADOW
NEIL A. CLARK
TINA C. MCINTYRE
KAREN A. PELCZARSKI

COUNSEL
THOMAS J. PAOLINO
JOHN H. FANNING
JAMES DIPRETE, JR.
LEONARD S. LAXIN O
MARK J. LEVINSON O
ROBERT D. WILLIAMS O
RICHARD A. CELLA O

RETIRED
STUART H. TUCKER
NOEL M. FIELD
THOMAS J. HOGAN

* Also admitted in Massachusetts
O Admitted in Massachusetts only
† Admitted in Pennsylvania
and Colorado only

HINCKLEY, ALLEN, TOBIN & SILVERSTEIN

Attorneys at Law

April 30, 1986

RECEIVED

MAY 2 1986

REGION I
OFFICE OF REGIONAL COUNSEL

E. Michael Thomas, Esq.
EPA Office of Regional Counsel
JFK Building, Room 2203
Boston, Massachusetts 02203

Re: The Cannons Engineering Corporation site in Bridgewater, Massachusetts; the Cannons Engineering Corporation site in Plymouth, Massachusetts; the Gilson Road site in Nashua, New Hampshire; and the Tinkham Garage site in Londonderry, New Hampshire, hereinafter collectively referred to as the Sites

Dear Mr. Thomas:

Our client, Olin Hunt Specialty Products Inc. ("Olin Hunt"), has referred to our attention the letter of Merrill S. Hohman, Director Waste Management Division, United States Environmental Protection Agency, dated March 28, 1986, regarding the above matter. In that letter, Mr. Hohman states that Olin Hunt is a "potentially responsible party" with respect to the sites and "encourages" Olin Hunt to undertake voluntarily the clean-up activities that EPA has determined are required at the Sites.

At the present time, Olin Hunt does not have sufficient information to properly evaluate EPA's request. For example, EPA has not provided Olin Hunt with the factual basis to support its claim that Olin Hunt is a potentially responsible party with respect to the Sites. Nor does Olin Hunt have information as to the contemplated cost of the suggested response activities, the extent, if any, to which Olin Hunt activities are causally related to the alleged releases of hazardous substances at the Sites, or the potential responsibility of other parties for the alleged releases of hazardous materials. In addition, there are numerous complex and novel legal issues raised by EPA's notice letter.

In response to EPA's request pursuant to section 104(e) of CRCLA and section 3007 of RCRA, Olin Hunt is continuing its



E. Michael Thomas, Esq.
April 30, 1986
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search for documents. It is anticipated that this search will be completed by May 30, 1986. To assist Olin Hunt in its search we would appreciate receiving any summary information that connects Olin Hunt with the Sites and an example of a bill of lading, invoice, or the like which EPA believes confirms the delivery of waste material to the Sites by Olin Hunt. In addition, we would like to receive the dates within which your records indicate that Olin Hunt transported materials to the Sites.

Nothing contained herein should be construed as an admission by or be binding on Olin Hunt. The purpose of this letter is to formally respond to EPA's March 28, 1986 letter to Olin Hunt to request additional data and information in order for us to further evaluate EPA's contention that Olin Hunt generated waste material disposed of at the Sites which, in fact, will result in a release or threatened release of contaminants into the environment.

If you have any further questions, do not hesitate to contact me.

Very truly yours,


Gregory V. Benik

GLB:nrb

cc: George Dana Bisbee
New Hampshire Dept. of Attorney General

Greg J. Wilson
Massachusetts Dept. of Attorney General